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www.sikestonbmu.org

## SIKESTON POWER STATION



1551 W. Wakefield  
P.O. Box 370  
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Phone: (573)-471-5000  
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mark@sbmu.net

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**Rick Landers**, General Manager

**Mark McGill**, Plant Manager

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February 13, 2020

Mr. Greg Snellen, Environmental Supervisor  
Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102-0176

Re: Sikeston Power Station  
Request for Information regarding the CCR Alternate Closure Timeframes

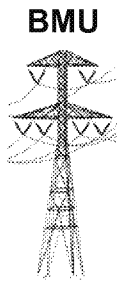
Dear Mr. Snellen:

This letter addresses the information you requested via electronic correspondence dated January 21, 2020 and February 10, 2020 regarding extensions under the alternative closure provisions in the Coal Combustion Residuals (CCR) Rule. Specifically, your correspondence references the new short-term and long-term alternative closure options that were recently presented in the Proposed Rule entitled Disposal of Coal Combustion Residuals from Electric Utilities: A Holistic Approach to Closure Part A: Deadline to Initiate Closure (Closure Part A Rule). You have asked whether the Sikeston Board of Municipal Utilities (SBMU) would avail these options for the above-referenced facility. As more fully described below, our regulatory path is not clear at this point, although SBMU would need an extension if closure or retrofit were required within the timeframes proposed in the Closure Part A Rule.

SBMU owns and operates the Sikeston Power Station (Sikeston Station), which has two impoundments subject to the CCR Rule. These CCR units are clay-lined. Sikeston Station is the only power generation facility owned by SBMU.

Since the issuance of the 2015 Rule, the CCR federal regulatory scheme has been in flux, including the provisions that dictate which CCR units must close and when they must close. We understand that EPA is planning to release another Proposed Rule called Hazardous and Solid Waste Management System: Disposal of CCR; A Holistic Approach to Closure Part B: Alternate Demonstration for Unlined Surface Impoundments; Implementation of Closure; Legacy Units (Closure Part B Rule). The Closure Part B Rule, together with the Closure Part A Rule, when they are finalized, will dictate whether the CCR units at Sikeston Station must close or undergo retrofitting and what the deadline will be. In the meantime, SBMU faces regulatory uncertainty that must be resolved before SBMU can practically proceed with construction. At this point, SBMU is confident that, if the Sikeston Station CCR units were required to close or retrofit, the facility could not meet the recently proposed closure deadline of August 2020 or the November 2020 deadline for facilities availing the short-term extension under the Closure Part A Rule. SBMU would plan to apply for an

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extension that would provide Sikeston Station a longer time period, should closure or retrofit be required.

If you have any questions, please contact me at 573-475-3119.

Sincerely,

Luke St. Mary  
Results Engineer/Plant Chemist  
Sikeston Power Station  
Sikeston BMU

C: Plant Manager, Sikeston Power Station

Sikeston Power Station